UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AARON RICHARD GOLUB, ESQUIRE, P.C.

AARON RICHARD GOLUB, ESQUIRE, P.C. and AARON RICHARD GOLUB,

Case No. 1:23-cv-10102-JSR

Plaintiff,

-against-

NOTICE OF MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT PURSUANT TO FED. R. CIV. P. 12

TIMOTHY BLUM and BLUM & POE, LLC, 1 NOW KNOWN AS BLUM

Defendants.

PLEASE TAKE NOTICE, that on February 22, 2024 at 2:30 PM, or as soon thereafter as counsel may be heard, Defendants Timothy Blum and Blum will move before the Honorable Jed. S. Rakoff at 500 Pearl Street, Courtroom 14B, New York, New York 10007 for (a) an Order granting Defendants' Motion to Dismiss the First Amended Complaint filed by Plaintiffs, Aaron Richard Golub, Esquire, P.C. and Aaron Richard Golub ("Plaintiffs") pursuant to Fed. R. Civ. P. Rule 12(b)(6); and (b) such other relief as this Court may deem just and proper. Pursuant to this Court's December 19, 2023 minute entry answering papers, if any, are to be filed by January 30, 2024 and reply papers are due February 13, 2024. Oral argument will be held on February 22, 2024 at 2:30 PM and the parties will jointly file a proposed case management plan prior to oral argument.

Dated: New York, New York January 2, 2024

¹ Defendant "Blum & Poe LLC" was renamed to Blum Los Angeles, LLC d/b/a Blum in October 2023 (hereinafter "Blum").

Respectfully Submitted,

/s/ Zachary Elsea
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